



ORIGINAL

Nicole Clyne
1072 Bedford Ave. #87
Brooklyn, NY 11216

Dated: October 28, 2021

US Eastern District Court:
225 Cadman Plaza E, Brooklyn, NY 11201

Judge Pollak and Komitee
Case #: NO. 20-CV-485
Plaintiffs Sarah Edmondson, et. al & Defendants Keith Raniere et. al.

Dear Honorable Judges Pollak and Komitee,

I am writing in response to Judge Komitee's request that defendants submit letters concerning how they intend to proceed. As an initial matter, it seems appropriate for me to advise the Court that I am not currently represented by counsel. Under my present financial circumstances, I frankly do not know how I could find an attorney competent to represent me in a lawsuit this complex and wide-ranging. I have concerns regarding how any testimony I might be compelled to give or rulings concerning my conduct might affect my rights in other legal proceedings that could occur in the future.

Having said this, however, I am submitting this letter as the Court has instructed. Based on my understanding of the law, as well as the comments of the attorneys who appeared at the October 15, 2021 status conference, it seems likely that I would join in any motion to dismiss under Rules 8, Rule 9, and Rule 12. I would also ask the Court to order that the names of all Jane Doe and John Doe plaintiffs. It seems impossible to contemplate litigating the claims against me, if they were to survive the initial motions, without knowing who is making them.

There are many other procedural issues, including possible conflicts of interest involving at least one of plaintiffs' lawyers, that will have to be addressed early on in this case. I am eager to provide relevant evidence concerning both that issue and the claims against me. I hope the Court will appreciate, however, my reluctance to address any of these without the advice of counsel. Even though I do not have access to sufficient funds now, I am still looking for ways to overcome that issue and find an attorney so that the complete truth will come out if the case does in fact go forward.

I appreciate the Court's consideration.

Respectfully submitted,

Nicole Clyne